## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

## PLAINTIFF'S ADDITIONAL REQUEST TO EXTEND TIME TO FILE AN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

Steven Beckman, Plaintiff in the above referenced matter, hereby requests that this Court allow additional time within which to file an Opposition to the Defendant's Motion to Dismiss until February 27, 2002. The grounds for this opposition are as follows:

- 1. Plaintiff, Steven Beckman filed his complaint for age discrimination and violation of the ADEA and ERISA on December 19, 2003.
- 2. Defendant, Bull, HN Information Systems, Inc., filed a Motion to Dismiss with the Court on January 23, 2004.
- 3. The Plaintiff filed an assented to Motion to Extend Time for Filing an Opposition to Defendant's Motion to Dismiss on February 6, 2004, requesting until February 12, 2004 within which to file an Opposition to Defendant's Motion to Dismiss.
- 4. Judge Gertner, in the related matter filed by the Commonwealth of Massachusetts and EEOC against the Defendant, issued an Order extending until February 24, 2004, the period of time for the

parties to submit an Order settling the case for the Court's approval or to move to reopen the proceedings.

- 5. The Order to be submitted by February 24, 2004 will specifically address one of the issues raised in the Defendant's Motion to Dismiss.
- 6. The Plaintiff requires additional time after February 24, 2004 to determine whether the Order will effect his claim and how to proceed in filing an Opposition to the Defendant's Motion to Dismiss.

WHEREFORE, the Plaintiff respectfully requests that this Court allow his Motion to Extend Time Within Which to File an Opposition to the Defendant's Motion to Dismiss up to and including Friday, February 27, 2004.

Respectfully submitted, Stephen Beckman By His Attorneys

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Date: February 2004

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 6, 2004, I caused a true and accurate copy of the above document to be served either by electronic transmission or by hand upon Kelly S. Black-Holmes, Esq., Hale and Dorr, LLP, 60 State Street, Boston, Massachusetts 02109.

Nancie L. Edgren